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BY: H
MEMO ENDORSED

Hon. Richard Berman
United States District Judge
United States District Court

USDC SDNY for the Southern District of New York
500 Pearl St., Room 650
New York, NY 10007
DOCUMENT ELECTRONICALLY FILED
DOC #: Re: ZIM INTEGRATED SHIPPING SERVS., LTD. V. BELCO RESOURCES, INC. ET AL., CASE NO. 07-CIV-5801(RMB)
DATE FILED: 2-5-08
Your Honor:

The Court will extend if the reply (unlike the brief in chief) is really "joint", as in integrated (without sacrificing individual arguments). It is commonly done but requires more effort than went into the joint brief.

SO ORDERED:
Date: 2/5/08 Richard M. Berman
Richard M. Berman, U.S.D.J.

We represent Sinochem Jiangsu Corporation ("Sinochem Jiangsu"), one of the defendants in the above-captioned case filed by plaintiff Zim Integrated Shipping Services, Ltd. ("Zim"). We are writing to request an extension of time of two (2) weeks to file reply papers in support of Sinochem Jiangsu's motion to dismiss Zim's complaint and to vacate Zim's prayer for a Rule (B) attachment.

According to your Order dated December 19, 2007, Sinochem Jiangsu's reply brief is due on Friday, February 8, 2008. We have spoken with counsel for all of the parties that have appeared (restricted or otherwise). Plaintiff Zim consents to Sinochem Jiangsu's request, and defendants Nanjing Huabin Foreign Trade & Economics Co. and Belco Resources, Inc., consent and ask for similar scheduling.

As you will recall, your Order dated December 19, 2007 was in response to Zim's letter request for additional time to file its opposition papers, because Zim was encountering difficulties locating people situated overseas. In addition to extending Zim's time to file its opposition papers, Your Order also extended the defendants' time to file their reply papers from January 18, 2008 to February 8, 2008.

At this time, we are encountering similar difficulties reaching the proper personnel in China to respond to Zim's allegations, due to the impact of the week-long celebration of the Chinese New

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Lawyers(USA) Solicitors Rechtsanwalte Avocats Advocaten Notarissen Avvocati Abogados

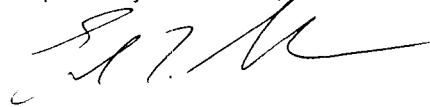
Hon. Richard Berman

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February 4, 2008

Year. We are also concerned by reports of severe weather conditions taking place in China, and how these developments could further limit our access to information and personnel. This request for an extension will have no impact on other deadlines in this litigation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'E. T. Schorr', with a long horizontal flourish extending to the right.

Edward T. Schorr

cc: Hon. Judge Gabriel W. Gorenstein
Vincent M. DeOrchis, Esq.
William R. Bennett, III, Esq.
Lauren Cozzolino Davies, Esq.